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14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 NOEL C. MURRAY, DR. SWARNA PERERA,
17 and JOYCE E. FRIEDMAN, on behalf of
themselves and all others similarly situated,

18 Plaintiffs,

19 v.

20 PROVIDENT TRUST GROUP, LLC,

21 Defendant.

Case No.: 2:18-cv-01382-MMD-GWF

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND THE TIME FOR
DEFENDANT TO RESPOND TO
FIRST AMENDED COMPLAINT**

(First Request)

22
23 Plaintiffs Noel C. Murray, Dr. Swarna Perera, and Joyce E. Friedman ("Plaintiffs"), by and
24 through their counsel of record, the Law Office of Hayes & Welsh, the Law Office of Christopher J.
25 Gray, P.C., and the Law Offices of Joshua B. Kons, LLC, and Defendant Provident Trust Group,
26 LLC, by and through its counsel of record, Greenberg Traurig, LLP, hereby stipulate and request
27 that the Court extend the time by which Defendant must respond to the First Amended Class Action
28

Complaint by thirty (30) days up to, and including, **June 21, 2019**. This Stipulation is made and based upon the following:

1. Plaintiffs filed their First Amended Class Action Complaint on May 8, 2019, in which they allege Defendant breached contractual duties as custodian of Plaintiffs' Individual Retirement Accounts. [ECF No. 46]. Plaintiffs seek certification to represent a class of similarly situated individuals across the country. *Id.*

2. Defendant was served with the First Amended Class Action Complaint via PACER on May 8, 2019, and Defendant's response is currently due May 22, 2019. *Id.*

3. Counsel for Defendant has requested additional time to evaluate Plaintiffs' allegations and prepare a response, taking into account the exercise of due diligence. Counsel for Plaintiffs has agreed to this request.

4. In light of the foregoing, the parties agree that Defendant shall have up to, and including, **June 21, 2019**, to respond to the First Amended Class Action Complaint.

5. This is the first request for an extension of time in this regard. This Stipulation is entered into in good faith and not for purposes of delay.

DATED this 14th day of May, 2019.

DATED this 14th day of May, 2019.

/s/ Jason Hicks
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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: May 15, 2019